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VIA ECF AND EMAIL

The Honorable James B. Clark, III, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street, Room PO 01
Newark, New Jersey 07101

Re: *Jane Doe v. John Smith*, Civ. No. 2:24-cv-634-ES-JCB

Dear Judge Clark:

As the Court is aware, this firm represents Defendant John Smith ("Defendant") in connection with the above-referenced matter. We write to seek the Court's assistance in directing the plaintiff to disclose the identity of the new parties included in the proposed amended complaint, referred to only as "John Jones, Joe Jones and Jane Jones." These parties were appropriately named using pseudonyms consistent with the prior order of the Court. However, in order to properly assess if or how to respond, we need the identity of the new parties.

To that end, I have contacted plaintiff's counsel on three separate occasions asking to privately disclose the identity of the new parties. On each occasion, counsel has not responded at all. I have asked local counsel and pro hac vice counsel and both have ignored my requests. As of now, opposition to the motion to amend is due Monday. Accordingly, I respectfully request that the Court order the private disclosure of the three new parties without further delay.

We thank Your Honor for Your attention to this matter.

Respectfully submitted,

/s/ Christopher D. Adams

Christopher D. Adams

cc: All parties via ECF